

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC 13 2018

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON JUNGE,

Defendant.

4:18CR1030 ERW/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18

U.S.C. §2256(2)(A));

- (c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device.

(18 U.S.C. §2256(6));

- (d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

- (A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

- (C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18

U.S.C. §2256(8)).

- 2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

- 3. Between on or about April 13, 2018 and April 17, 2018, in the Eastern District of Missouri, and elsewhere,

BRANDON JUNGE,

the defendant herein, knowingly distributed, by using any means or facility of interstate and foreign commerce, a graphic image and video files which contained child pornography, including, but not limited to, the following:

1. "2e5141b4e2f4643fd5a5a804b715af5a" – a graphic image file depicting two prepubescent female minor child with one minor child in a lascivious display of genitals;
2. "5005.JPG" with MD5 Hash Value: "aa89664e6160b872cc874250de0a863c" - a graphic image file depicting one prepubescent minor female holding a pink shawl while in a lascivious display of her genitals;
3. "5005.JPG" with MD5 Hash Value: "6944304b5ce44e5d4cdee27959785a8" - a graphic image depicting a minor female prepubescent child in a lascivious display of genitals.

In violation of Title 18, United States Code, Section 2252A(a)(2)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

COLLEEN C. LANG, #56872MO
Assistant United States Attorney